

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CYNTHIA DONALD,)	
)	Case No. 20 cv 6815
Plaintiff,)	
v.)	Hon. Elaine E. Bucklo
)	
CITY OF CHICAGO <i>et al.</i> ,)	Magistrate Judge Jeffrey Cole
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE ITS DISPOSITIVE MOTION**

Defendant City of Chicago (“the City”), through its attorney, Corporation Counsel of the City of Chicago, requests a 30-day extension of time, through May 1, 2023, to file its dispositive motion pursuant to Fed. R. Civ. P. 6(b)(1). In support of this motion, the City submits the following.

1. Pursuant to this Court’s December 27, 2022 order, dispositive motions in this matter are due by March 31, 2023, with responses due April 21, and replies due May 5. *See* Minute Order, CM/ECF No. 189.
2. Due to unanticipated staffing changes in the Employment Litigation Division of the City’s Department of Law and overlapping dispositive motion deadlines in other matters, the City requires a 30-day extension of time to file its dispositive motion.
3. After discussing the proposed extension of time with counsels for Plaintiff and Eddie Johnson, the City proposes that dispositive motions be due May 1, 2023; responses due June 20, 2023; and replies due July 11, 2023.
4. This motion is not filed for any improper purpose or to delay the progress of this case. Counsels for Plaintiff and Defendant Eddie Johnson indicated on March 13, 2023 that they have no objection to the relief sought in this motion.

For the foregoing reasons, Defendant City of Chicago respectfully requests the Court allow it an additional 30 days, until May 1, 2023 to file its dispositive motion, with responses filed by June 20, and replies filed by July 11.

Dated: March 13, 2023

Respectfully submitted,

Corporation Counsel of the City of Chicago

By: s/ Matthew E. Suhl
Matthew E. Suhl
Assistant Corporation Counsel
Attorney for Defendant City of Chicago

City of Chicago, Department of Law
Employment Litigation Division
2 North LaSalle Street, Suite 640
Chicago, Illinois 60602
312.742.1935
Matthew.suhl@cityofchicago.org